

KEKER  
VAN NEST  
& PETERS

LATHAM & WATKINS LLP

MORRISON FOERSTER

July 14, 2025

**VIA ECF**

Hon. Sidney H. Stein  
Daniel Patrick Moynihan  
United States Courthouse  
500 Pearl St.  
New York, NY 10007-1312

Re: ***In Re: OpenAI, Inc., Copyright Infringement Litigation, No. 1:25-md-3143-SHS-OTW***,  
This Document Relates To: *Ziff Davis, Inc. et al v. OpenAI, Inc., et al.*, No. 25-cv-04315-SHS-OTW

Dear Judge Stein:

OpenAI Defendants ("OpenAI") respectfully request a 14-day extension of the deadline to respond to the amended complaint filed by the Plaintiffs in *Ziff Davis, Inc. et al v. OpenAI, Inc., et al.*, No. 25-cv-04315-SHS-OTW (collectively, "Ziff Davis"). See Ziff Davis ECF 105. Should OpenAI file a motion to dismiss the amended complaint, OpenAI consents to a 14-day extension for Ziff Davis to respond to the motion, and Ziff Davis consents to a 14-day extension for OpenAI to file a reply in support of its motion.

OpenAI's deadline to respond to the Ziff Davis amended complaint is currently July 16, 2025. This is OpenAI's first request for an extension in this matter. Ziff Davis consents to this request. OpenAI respectfully requests that the Court extend the deadline for OpenAI to respond to the Ziff Davis amended complaint to **July 30, 2025**. OpenAI further requests that, should OpenAI move to dismiss the complaint, the deadline for Ziff Davis to respond to the motion be extended to **August 27, 2025**, and the deadline for OpenAI to file a reply in support of its motion be extended to **September 10, 2025**.

Respectfully,

KEKER, VAN NEST &  
PETERS LLP\*

/s/ Christopher S. Sun

Christopher S. Sun\*

LATHAM & WATKINS LLP

/s/ Elana Nightingale Dawson

Elana Nightingale Dawson

MORRISON &  
FOERSTER LLP\*

/s/ Rose S. Lee

Rose S. Lee\*

cc: All Counsel of Record Line (via ECF)

\* All parties whose electronic signatures are included herein have consented to the filing of this document.

SHS ✓

7/15/25  
Sonder  
Sidney H. Stein  
USDC